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8 *Attorneys for Defendants Irico Group Corp. and*
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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL INDIRECT PURCHASER ACTIONS*

**DECLARATION OF WYATT M. CARLOCK
IN SUPPORT OF IRICO DEFENDANTS'
MOTION IN LIMINE #8 TO EXCLUDE
INVESTIGATIONS BY FOREIGN
AUTHORITIES INTO CRT INDUSTRY**

21 Judge: Honorable Jon S. Tigar
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1 I, Wyatt M. Carlock, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of
6 Irico Defendants’ Motion in Limine #9 To Exclude Investigations by Foreign Authorities into CRT
7 Industry. If called as a witness, I could and would testify to the matters set forth in this declaration
8 of my own personal knowledge.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of Deposition Exhibit 8602,
10 which is a certified translation of a document produced in this litigation by Irico Defendants
11 bearing the Bates label IRI-CRT-00005996E.

12 3. Attached hereto as Exhibit 2 is a true and correct copy of Deposition Exhibit 8603,
13 which is a certified translation of a document produced in this litigation by Irico Defendants
14 bearing the Bates label IRI-CRT-00005995E.

15 4. Attached hereto as Exhibit 3 is a true and correct copy of Deposition Exhibit 8610,
16 which is a letter from Pillsbury Winthrop Shaw Pittman LLP, counsel for Irico Defendants at the
17 time, to counsel for Indirect Purchaser Plaintiffs responding to Plaintiffs’ Information Request,
18 dated January 15, 2009.

19 5. Attached hereto as Exhibit 4 is a true and correct copy of Deposition Exhibit 8400,
20 which is a pdf copy of an email sent by Pillsbury Winthrop Shaw Pittman LLP, counsel for Irico
21 Defendants at the time, attaching a letter to counsel for Indirect Purchaser Plaintiffs responding to
22 Plaintiffs’ Information Request, dated January 15, 2009.

23 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from Deposition
24 Exhibit 630E, which is a certified translation of Decision no. 2011-019 of the Korean Fair Trade
25 Commission, dated March 10, 2011.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th
2 day of August, 2023, in Arlington, Virginia.

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4 /s/ Wyatt M. Carlock

5 Wyatt M. Carlock (*pro hac vice*)
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13 *and Irico Display Devices Co., Ltd.*
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